

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

SERGIO NAVARRO, THERESA GAMAGE, DAYLE BULLA, JANE KINSELLA, and ERICA McKINLEY, on their own behalf, on behalf of all others similarly situated, and on behalf of the Wells Fargo & Company Health Plan and its component plans,

Plaintiffs,

v.

WELLS FARGO & COMPANY,

Defendant.

Civil Action No. 0:24-cv-03043-LMP-DLM

**CERTIFICATE OF COMPLIANCE**

The undersigned counsel for Plaintiffs hereby certifies that Plaintiffs' Memorandum of Law in Support of their Motion Regarding Continued Sealing of Reference List complies with Local Rule 7.1(f) and 7.1(h). Counsel for Plaintiffs further certifies that, in preparation of this document, the word-count function of Microsoft Word 365 was used, and that this function was applied specifically to include all text, including headings, footnotes, and quotations, and exclude all other portions of the document. The undersigned further certifies that this document contains the following number of words: 854.

Dated: May 19, 2025

Respectfully Submitted,

/s/ Kai H. Richter

Kai Richter MN Bar No. 0296545  
COHEN MILSTEIN SELLERS & TOLL, PLLC  
400 South 4th Street #401-27  
Minneapolis, MN 55415  
Telephone: (612) 807-1575  
krichter@cohenmilstein.com

*Counsel for Plaintiffs and the Proposed Class*